



FEDERAL ELECTION COMMISSION
Washington, DC 20463

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2 **MEMORANDUM**

3
4 **TO:** The Commission

5
6 **FROM:** Lisa J. Stevenson
7 Acting General Counsel

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9 Kathleen M. Guith
10 Associate General Counsel for Enforcement

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12 Stephen A. Gura
13 Deputy Associate General Counsel for Enforcement

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15 **BY:** Mark Allen *MA*
16 Assistant General Counsel

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18 Christine C. Gallagher
19 Attorney

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21 **SUBJECT:** MUR 7434 (Gary Johnson Victory Fund)
22 Pre-Probable Cause Conciliation Agreement

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25 On July 17, 2018, the Commission found reason to believe that Gary Johnson Victory
26 Fund and Christina Needham in her official capacity as treasurer (the "Committee") violated
27 52 U.S.C. § 30104(b)(2) and (4) by failing disclose an aggregate total of \$899,400.01 in receipts
28 and disbursements on its original October 2016 Quarterly Report.¹ The Commission also voted
29 to enter into pre-probable cause conciliation with the Committee.² Attached is a conciliation
30 agreement negotiated with the Committee and signed by the treasurer.³ We recommend that the
31 Commission accept the signed agreement.
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1 MUR 7434 Commission Certification at ¶ 2b (July 18, 2018).

2 *Id.* at ¶ 2d.

3 Attach. 1.

4 Attach. 2.

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The negotiated agreement contains no other substantive changes to the original agreement and represents a reasonable settlement of this matter. Therefore, we recommend that the Commission accept the attached agreement and close the file in this matter.

RECOMMENDATIONS:

1. Accept the attached conciliation agreement with Gary Johnson Victory Fund and Christina Needham in her official capacity as treasurer.
2. Approve the appropriate letter.
3. Close the file.

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